

EXHIBIT 1

Roberts, Stephen T.

From: McCabe, Eileen T.
Sent: Wednesday, September 08, 2021 3:41 PM
To: 'TLadd@McCarter.com'; Kahn, Brett; Farina, Jennifer (jfarina@mccarter.com)
Cc: Roberts, Stephen T.; Granat, Wallis; Sherman, Zachary
Subject: J&J

Tom- thanks for the recent meet and confer call and we hope that you and the others on this email enjoyed your Labor Day weekend.

As to the deposition of Ms. Sheridan, we would like to schedule that for as soon as possible, preferably within the next two weeks. Please provide us with available dates.

As to Mr. White, we considered your proposal to submit special interrogatories in lieu of a deposition and although we appreciate the offer, we would like to proceed with the deposition. After careful consideration on our part, we do not believe interrogatories will take the place of a deposition. Please let us know if you will be producing Mr. White or intend to file a motion for a protective order in that regard.

Finally, we asked whether J&J intended to produce the settlement agreements they have entered into with claimants in the underlying litigation and you were uncertain as to whether J&J would in fact be producing them as part of its next production. Can you please confirm J&J's position on this as soon as possible so we know whether we need to engage in motion practice on this issue.

Thanks very much. Eileen

Eileen McCabe
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